

EXHIBIT C

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DEFINITIONS

1. “Asbestos” as used herein shall include all Asbestos or asbestiform minerals of either the amphibole or serpentine group, and shall include chrysotile, amosite, crocidolite, tremolite, anthophyllite and actinolite.

2. “Asbestos-Containing Product” is an inclusive term and includes, but is not limited to, Asbestos in any form or variety and any compound, material, manufactured or fabricated thing or equipment containing Asbestos in any form or variety. “Asbestos-Containing Product” is specifically not limited with respect to product type or form, such as thermal insulation, refractories, mastics, raw Asbestos, etc. and shall include all product types and forms.

3. An “Asbestos Claim” means any lawsuit, workers’ compensation claim, civil action, demand letter, notice of claim, proof of claim or any other similar assertion brought by an individual (or an individual’s personal representative) against any Debtor alleging bodily injuries or wrongful death allegedly caused by exposure to Asbestos or Asbestos-Containing Products. “Asbestos Claim” includes any claim or demand ever asserted against any Debtor regardless of how such claim was resolved (by settlement, dismissal, or otherwise) and regardless of whether such claim resulted in the filing of a civil lawsuit by the claimant.

4. “GM Entity” means Old GM (as defined below) and any subsidiary, affiliate, or predecessor thereof wherever located, specifically including any subsidiary, affiliate, or predecessor located, domiciled or doing business outside the United States.

5. “Old GM” means the entity formerly known as General Motors Corporation and now known as Motors Liquidation Company, the lead Debtor in the above-captioned bankruptcy case.

**SUBJECT MATTERS OF TESTIMONY BY DESIGNATED CORPORATE
REPRESENTATIVES**

1. The identification of each data base in your possession, custody, or control, that collects or compiles in digital or electronic form any information or details concerning Asbestos Claims (each, an “Asbestos Claims Database”). The identification of any Asbestos Claims Database should include the following information:

(a) any name or designation by which your employees or representatives routinely refer to the Asbestos Claims Database;

(b) the period of time to which the information contained in the database, taken as a whole, relates;

(c) identification of each GM Entity that is or was a defendant to any Asbestos Tort Claim reflected in the data that is contained in the Asbestos Claims Database;

(d) identification and description of all data fields or categories of information the Asbestos Claims Database was designed to include (for example, claimant’s name, date of birth, and social security number; date of first asbestos exposure; period of asbestos exposures; place(s) of exposure(s); products alleged to be sources of exposure; open or closed claim; if applicable, date of settlement, date of judgment, plaintiff’s or defendant’s verdict, amount of payment and date of payment);

(e) whether New GM has provided the Asbestos Claims Database in whole or in part to the Debtors and, if so, the date(s) on which the Asbestos Claims Database or

portions of its contents were so provided; the identity of each individual who was responsible for providing the Debtors with that information; and the identity of each individual who was responsible for receiving that information on behalf of the Debtors; and

(f) if any New GM has provided any Asbestos Claims Database to the Debtors in part, but not in whole, identification of which data fields or categories of information were withheld and the reasons for withholding them.

2. For each Asbestos Claims Database identified in responses to Topic No. 1, identification of the individual New GM considers most knowledgeable about the design, contents, and capabilities of the Asbestos Claims Database, the sources of information drawn upon in compiling the data, the processes and procedures employed in compiling and maintaining the Asbestos Claims Database, and the uses New GM or Old GM have made of the Asbestos Claims Database.

3. Identification of each lead trial counsel who defended an Old GM Entity in the jury trial of an Asbestos Claim at any time after January 1, 2000.

4. For the time period January 1, 2000, through May 31, 2009, identification of each trial of an Asbestos Claim that went to verdict at a time when any GM Entity was a remaining defendant, and for each such trial the following information: the court and jurisdiction in which the matter was tried, the name of plaintiff, the identity of plaintiff's counsel, the identity of lead trial counsel for the GM Entity, the disease alleged by plaintiff, whether a verdict was returned in favor of plaintiff, the amount of the verdict as to all defendants, the amount of the verdict allocated to the GM Entity, and the amount of any post-verdict settlement or judgment paid by the GM Entity (or bonded by the GM Entity if the case

was appealed); and the identification of source materials from which this information was obtained.

5. Identification of any lawyer, claims adjuster, or other representative who represented any GM Entity in the settlement or resolution of a group of 500 or more Asbestos Claims entered into between January 1, 2000, and May 31, 2000.

6. Identification of any lawyer, claims adjuster, or other representative who represented any GM Entity in the settlement of any Asbestos Claim which was entered into between January 1, 2006, and May 31, 2009.

7. Identification of all lawyers, risk managers, claims adjusters, or other representatives or employees of any GM Entity who had substantial responsibility for Asbestos Claim matters at any time between January 1, 2000, and May 31, 2009.

8. Identification of all lawyers, risk managers, claims adjusters, or other representatives or employees of any GM Entity who had substantial responsibility for Asbestos Claims involving mesothelioma at any time from January 1, 2000, until May 31, 2009.

9. Identification of all individuals who had a substantial role in recommending or deciding on behalf of any GM Entity whether to settle or try Asbestos Claims at any time from January 1, 2000, until May 31, 2009.

10. Identification of all individuals who, at any time from January 1, 2000, until May 31, 2009, had a substantial role in making recommendations or decisions upon (a) strategies followed by any GM Entity for the management, defense, or resolution of Asbestos Claims, or (b) economic, financial, or budgetary aspects of the management, defense, or resolution of Asbestos Claims by any GM Entity.

11. Old GM's experience with asbestos personal injury litigation, including, but not limited to (a) the supervision and conduct of any GM Entity's Asbestos litigation defense; (b) the litigation and settlement strategies and experience of any GM Entity; (c) defenses raised or considered by any GM Entity to defend itself in Asbestos personal injury litigation; and (d) Asbestos Claims that were disposed of without payment by any GM Entity.

12. The management, defense, or resolution of Asbestos Claims jointly with Ford Motor Company, Chrysler Group LLC, or their predecessors, subsidiaries and affiliates.

13. The identification and description of every Asbestos-Containing Product that any GM Entity ever manufactured, sold, distributed, marketed, or used, including for each such product the following information:

- (a) the identity of each GM Entity that engaged in the manufacture, sale, distribution, marketing or use of the Asbestos-Containing Product (e.g., GM itself or specified subsidiaries, affiliates, or predecessors);
- (b) the brand name(s) of the product;
- (c) the date the product first went into production;
- (d) the last date the product was produced;
- (e) the last date the product was sold;
- (f) all manufacturing locations;
- (g) dates of manufacture at each location;
- (h) the percentage of Asbestos, and the dates and all reasons for any modification thereto;

- (i) the type of Asbestos and any chemical analysis of the composition of such product;
- (j) the specific source of Asbestos with dates;
- (k) the color, physical characteristics, and appearance of the product;
- (l) a full and precise description of all forms of the package in which the product was sold or distributed, including, but not limited to, type of package, size, color(s), and writings thereon;
- (m) all other names under which the product was sold, including without limitation, pursuant to a GM Licensed Product;
- (n) the number and date of each patent or patent application as to the product.

14. The number, value, and timing of Asbestos Claims asserted or forecasted to be asserted against any GM Entity based on alleged exposure to locomotive brakes or insulation used in locomotives.

15. Identification of each GM Entity that manufactured, installed, serviced, replaced, marketed, or distributed Asbestos-containing locomotive brakes or insulation used in locomotives.

16. Whether or in what circumstances locomotive brakes or insulation manufactured, installed, serviced, replaced, marketed, sold, distributed, or used by any GM Entity is or was capable of causing or contributing to the causation of mesothelioma, lung cancer, any other form of cancer or malignant disease, asbestosis, pleural effusions, pleural plaques, or any other non-malignant disease or abnormal condition of the lungs.

17. The number, value, and timing of Asbestos Claims asserted or forecasted to be asserted against any GM Entity based on alleged exposure to Asbestos in premises owned, leased, or controlled by a GM Entity.

18. Asbestos Claims arising out of or related to any Asbestos-Containing Products manufactured, sold, distributed, marketed, or used by any GM Entity outside the United States.

19. Identification of the premises of any GM Entity that has been alleged or shown to be a source of Asbestos exposure resulting in any Asbestos-related disease or health condition, including the location of each such premises, the nature of the business or industrial activities conducted there during the periods in which individuals have allegedly been exposed there to Asbestos, and the nature and purpose of the Asbestos-containing products alleged to have been the sources of such exposures.

20. Whether or in what circumstances any Asbestos-containing brake products manufactured, sold, distributed, marketed, or used by any GM Entity have caused, contributed to the causation of, or are or were capable of causing or contributing to the causation of mesothelioma, lung cancer, any other form of cancer or malignant disease, asbestosis, pleural effusions, pleural plaques, or any other non-malignant disease or abnormal condition of the lungs;

21. Whether or in what circumstances any Asbestos-containing friction products other than brakes, including without limitation clutch facings, manufactured, sold, distributed, marketed, or used by any GM Entity have caused, contributed to the causation of, or are or were capable of causing or contributing to the causation of mesothelioma, lung cancer, any

other form of cancer or malignant disease, asbestosis, pleural effusions, pleural plaques, or any other non-malignant disease or abnormal condition of the lungs; and

22. Whether or in what circumstances Chrysotile Asbestos is or was capable of causing or contributing to the causation of mesothelioma.

23. Whether or in what circumstances Asbestos-containing locomotive brakes or insulation products used in locomotives have caused, contributed to the causation of, or are or were capable of causing or contributing to the causation of mesothelioma, lung cancer, any other form of cancer or malignant disease, asbestosis, pleural effusions, pleural plaques, or any other non-malignant disease or abnormal condition of the lungs.

24. Whether or in what circumstances exposures to Asbestos or Asbestos-containing products in premises owned, leased, or controlled by any GM Entity have caused, contributed to the causation of, or was capable of causing or contributing to the causation of mesothelioma, lung cancer, any other form of cancer or malignant disease, asbestosis, pleural effusions, pleural plaques, or any other non-malignant disease or abnormal condition of the lungs.

25. The identification of all documents or other sources from which the information provided with respect to the foregoing subject matters was obtained.

26. The conduct and results of searches for documents responsive to discovery requests issued by the ACC.